

COOLEY LLP
MICHAEL A. ATTANASIO (151529)
(mattanasio@cooley.com)
BENEDICT Y. HUR (224018)
(bhur@cooley.com)
SIMONA AGNOLUCCI (246943)
(sagnolucci@cooley.com)
EDUARDO E. SANTACANA (281668)
(esantacana@cooley.com)
ARGEMIRA FLÓREZ (331153)
(aflorez@cooley.com)
NAIARA TOKER (346145)
(ntoker@cooley.com)
HARRIS MATEEN (335593)
(hmateen@cooley.com)
THILINI CHANDRASEKERA (333672)
(tchandrasekera@cooley.com)
ISABELLA MCKINLEY CORBO (346226)
(icorbo@cooley.com)
CHELSEA HU (357212)
(chu@cooley.com)
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2000
Facsimile: (415) 693-2222

Attorneys for Defendant
GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Plaintiffs,

V.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

GOOGLE'S DISCOVERY DESIGNATIONS

Dept: 3, 17th Fl.
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020
Trial Date: August 18, 2025

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Interrogatories (ROG)	2021-03-17 Anibal Rodriguez Responses to Google LLC ROG-1, No. 1	B, V, MIS, MIL, R, 403
Interrogatories (ROG)	2021-03-17 Anibal Rodriguez Responses to Google LLC ROG-1, No. 2	B, V, MIS, MIL, R, 403
Interrogatories (ROG)	2021-03-17 Anibal Rodriguez Responses to Google LLC ROG-1, No. 3	B, V, 403
Interrogatories (ROG)	2021-03-17 Julian Santiago Responses to Google LLC ROG-1, No. 1	B, V, MIS, MIL, R, 403
Interrogatories (ROG)	2021-03-17 Julian Santiago Responses to Google LLC ROG-1, No. 2	B, V, MIS, MIL, R, 403
Interrogatories (ROG)	2021-03-17 Julian Santiago Responses to Google LLC ROG-1, No. 3	B, V, 403
Interrogatories (ROG)	2021-03-17 Sal Cataldo Responses to Google LLC ROG-1, No. 1	B, V, MIS, MIL, R, 403. Plaintiffs also objected to Google's designation of Cataldo's responses on the ground that he will not be a class representative at trial.
Interrogatories (ROG)	2021-03-17 Sal Cataldo Responses to Google LLC ROG-1, No. 2	B, V, MIS, MIL, R, 403. Plaintiffs also objected to Google's designation of Cataldo's responses on the ground that he will not be a class representative at trial.
Interrogatories (ROG)	2021-03-17 Sal Cataldo Responses to Google LLC ROG-1, No. 3	B, V, 403. Plaintiffs also objected to Google's designation of Cataldo's responses on the ground that he will not be a class representative at trial.
Interrogatories (ROG)	2021-03-17 Susan Harvey Responses to Google LLC ROG-1, No. 1	B, V, MIS, MIL, R, 403
Interrogatories (ROG)	2021-03-17 Susan Harvey Responses to Google LLC ROG-1, No. 2	B, V, MIS, MIL, R, 403
Interrogatories (ROG)	2021-03-17 Susan Harvey Responses to Google LLC ROG-1, No. 3	B, V, 403
Interrogatories (ROG)	2021-10-08 Anibal Rodriguez Responses to Google LLC ROG-2, No. 4	B, S, V, P, 403, MIL
Interrogatories (ROG)	2021-10-08 Anibal Rodriguez Responses to Google LLC ROG-2, No. 5	B, S, V, P, 403, MIL
Interrogatories (ROG)	2021-10-08 Julian Santiago Responses to Google LLC ROG-2, No. 4	B, S, V, P, 403, MIL
Interrogatories (ROG)	2021-10-08 Julian Santiago Responses to Google LLC ROG-2, No. 5	B, S, V, P, 403, MIL

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Interrogatories (ROG)	2021-10-08 Sal Cataldo Responses to Google LLC ROG-2, No. 4	B, S, V, P, 403, MIL. Plaintiffs also objected to Google's designation of Cataldo's responses on the ground that he will not be a class representative at trial.
Interrogatories (ROG)	2021-10-08 Sal Cataldo Responses to Google LLC ROG-2, No. 5	B, S, V, P, 403, MIL. Plaintiffs also objected to Google's designation of Cataldo's responses on the ground that he will not be a class representative at trial.
Interrogatories (ROG)	2021-10-08 Susan Harvey Responses to Google LLC ROG-2, No. 4	B, S, V, P, 403, MIL
Interrogatories (ROG)	2021-10-08 Susan Harvey Responses to Google LLC ROG-2, No. 5	B, S, V, P, 403, MIL
Interrogatories (ROG)	2022-07-13 Anibal Rodriguez Responses to Google LLC ROG-3, No. 6	P, 403
Interrogatories (ROG)	2022-07-13 Julian Santiago Responses to Google LLC ROG-3, No. 6	P, 403, IOR
Interrogatories (ROG)	2022-07-13 Julian Santiago Responses to Google LLC ROG-3, No. 7	P, 403, IOR
Interrogatories (ROG)	2022-07-13 Sal Cataldo Responses to Google LLC ROG-3, No. 6	P, 403. Plaintiffs also objected to Google's designation of Cataldo's responses on the ground that he will not be a class representative at trial.
Interrogatories (ROG)	2022-07-13 Sal Cataldo Responses to Google LLC ROG-3, No. 7	P, 403. Plaintiffs also objected to Google's designation of Cataldo's responses on the ground that he will not be a class representative at trial.
Interrogatories (ROG)	2022-07-13 Susan Lynn Harvey Responses to Google LLC ROG-3, No. 6	P, 403
Interrogatories (ROG)	2022-08-17 Anibal Rodriguez Responses to Google LLC ROG-4, No. 7	B, S, CO, 403
Interrogatories (ROG)	2022-08-17 Anibal Rodriguez Responses to Google LLC ROG-4, No. 8	B, S, CO, 403
Interrogatories (ROG)	2022-08-17 Julian Santiago Responses to Google LLC ROG-4, No. 8	B, S, CO, 403
Interrogatories (ROG)	2022-08-17 Julian Santiago Responses to Google LLC ROG-4, No. 9	B, S, CO, 403

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Interrogatories (ROG)	2022-08-17 Sal Cataldo Responses to Google LLC ROG-4, No. 8	B, S, CO, 403. Plaintiffs also objected to Google's designation of Cataldo's responses on the ground that he will not be a class representative at trial.
Interrogatories (ROG)	2022-08-17 Sal Cataldo Responses to Google LLC ROG-4, No. 9	B, S, CO, 403. Plaintiffs also objected to Google's designation of Cataldo's responses on the ground that he will not be a class representative at trial.
Interrogatories (ROG)	2022-08-17 Susan Lynn Harvey Responses to Google LLC ROG-4, No. 7	B, S, CO, 403
Interrogatories (ROG)	2022-08-17 Susan Lynn Harvey Responses to Google LLC ROG-4, No. 8	B, S, CO, 403
Interrogatories (ROG)	2022-10-31 Julian Santiago AMENDED Responses to Google LLC ROG-3, No. 6	P, 403
Interrogatories (ROG)	2022-10-31 Julian Santiago AMENDED Responses to Google LLC ROG-3, No. 7	P, 403
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 1	None
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 2	None
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 3	R, 403, MIL
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 4	R, 403, MIL
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 5	R, 403, MIL
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 6	None
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 7	403, D
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 8	None

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 9	D, 403
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 10	None
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 11	None
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 12	None
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 13	None
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 14	R, 403, V, MIL
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 15	R, 403, V, MIL, D
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 16	R, 403, V, MIL, D
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 17	R, 403, V, MIL, D
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 18	R, 403, MIL, CO
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 19	R, 403, MIL, D, CO
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 20	R, 403, MIL, D, CO
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 21	R, 403, MIL, D, CO
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 22	R, 403

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 23	R, 403
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 24	MIS, 403
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 25	MIS, D, 403
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 26	R, 403, MIL, V
Request for Admissions (RFA)	2021-06-11 Anibal Rodriguez Responses to Google LLC RFA-1, No. 27	V, R, 403, MIL
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 1	None
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 2	403, D
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 3	None
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 4	D, 403
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 5	None
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 6	None
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 7	None
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 8	403
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 9	R, 403, V, MIL

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 10	R, 403, V, MIL, D
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 11	R, 403, V, MIL, D
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 12	R, 403, V, MIL, D
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 13	R, 403, MIL, CO
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 14	R, 403, MIL, D, CO
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 15	R, 403, MIL, D, CO
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 16	R, 403, MIL, D, CO
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 17	R, 403
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 18	R, 403
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 19	MIS, 403
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 20	MIS, D, 403
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 21	R, 403, MIL, V
Request for Admissions (RFA)	2021-06-11 Julian Santiago Responses to Google LLC RFA-1, No. 22	V, R, 403, MIL
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, Nos. 1-22	Plaintiffs object to all of Mr. Cataldo's designations on the ground that he will not be a class representative at trial. In addition, Plaintiffs raise the below objections

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 1	Plaintiffs object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 2	403, D
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 3	Plaintiffs object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 4	D, 403
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 5	Plaintiffs object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 6	Plaintiffs object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 7	Plaintiffs object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 8	Plaintiffs object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 9	R, 403, V, MIL. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 10	R, 403, V, MIL, D. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 11	R, 403, V, MIL, D. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 12	R, 403, V, MIL, D. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 13	R, 403, MIL, CO. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 14	R, 403, MIL, D, CO. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 15	R, 403, MIL, D, CO. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 16	R, 403, MIL, D, CO. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 17	R, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 18	R, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 19	MIS, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 20	MIS, D, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 21	R, 403, MIL, V. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Sal Cataldo Responses to Google LLC RFA-1, No. 22	V, R, 403, MIL. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 1	None
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 2	403, D
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 3	None

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 4	D, 403
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 5	None
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 6	None
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 7	None
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 8	None
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 9	R, 403, V, MIL
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 10	R, 403, V, MIL, D
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 11	R, 403, V, MIL, D
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 12	R, 403, V, MIL, D
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 13	R, 403, MIL, CO
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 14	R, 403, MIL, D, CO
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 15	R, 403, MIL, D, CO
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 16	R, 403, MIL, D, CO
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 17	R, 403

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 18	R, 403
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 19	MIS, 403
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 20	MIS, D, 403
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 21	R, 403, MIL, V
Request for Admissions (RFA)	2021-06-11 Susan Lynn Harvey Responses to Google LLC RFA-1, No. 22	V, R, 403, MIL
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 28	R, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 29	R, 403, D
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 30	R, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 31	R, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 32	R, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 33	R, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 34	R, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 35	R, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 36	None

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 37	D, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 38	V, D, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 39	V, D, 403
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 40	R, 403, V
Request for Admissions (RFA)	2022-07-13 Anibal Rodriguez Responses to Google RFA-2, No. 41	R, 403, V
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 23	R, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 24	R, 403, D
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 25	R, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 26	R, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 27	R, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 28	R, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 29	R, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 30	R, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 31	None

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 32	D, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 33	V, D, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 34	V, D, 403
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 35	R, 403, V
Request for Admissions (RFA)	2022-07-13 Julian Santiago Responses to Google LLC RFA-2, No. 36	R, 403, V
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, Nos. 23-36	Plaintiffs object to all of Mr. Cataldo's designations on the ground that he will not be a class representative at trial. In addition, Plaintiffs raise the below objections
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 23	R, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 24	R, 403, D. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 25	R, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 26	R, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 27	R, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 28	R, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 29	R, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 30	R, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 31	Plaintiffs object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 32	D, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 33	V, D, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 34	V, D, 403. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 35	R, 403, V. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Sal Cataldo Responses to Google LLC RFA-2, No. 36	R, 403, V. Plaintiffs also object on the ground that Cataldo will not be a class representative at trial.
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 23	R, 403
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 24	R, 403, D
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 25	R, 403
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 26	R, 403
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 27	R, 403

Discovery Type	Defendant's Affirmative Designations	Plaintiffs' Objections
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 28	R, 403
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 29	R, 403
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 30	R, 403
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 31	None
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 32	D, 403
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 33	V, D, 403
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 34	V, D, 403
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 35	R, 403, V
Request for Admissions (RFA)	2022-07-13 Susan Lynn Harvey Responses to Google LLC RFA-2, No. 36	R, 403, V

Code	Code Objection
403	Pursuant to Fed. R. Evid. 403, the danger of unfair
B	The discovery request is overly broad and/or unduly
CO	The discovery request and response are compound
D	The discovery request is duplicative of other discovery
I	Pursuant to Fed. R. Evid. 106, the designation is incomplete,
IOR	The designation is to an earlier version of a response that
MIL	For the reasons set forth in Google's motions in limine, the
MIS	The discovery request mischaracterizes the evidence
NPE	The designation consists of a negative contention, and thus
O	The discovery request calls for an expert opinion, rendering
P	The discovery request seeks information protected from
R	Pursuant to Fed. R. Evid. 402, the subject matter of the
S	The discovery request calls for speculation
V	The discovery request is vague and/or ambiguous